

1 A. I was in the hallway, and that's when
2 Deputy Necaise walked over. And it was actually,
3 I believe, Cell Number 5.

4 Q. Okay. And did you have your keys with
5 you at this time?

6 A. Yes. I had everything with me.

7 Q. So you still --

8 A. Yeah.

9 Q. I'm sorry. Go ahead.

10 A. I had everything with me. They had
11 placed me out in the hall for a little while. And
12 Necaise come over and Deputy Judy was standing --
13 the door was to the right. I was facing the back
14 of the booking room, which would be the office. I
15 was facing the office. The booking room would be
16 to the left -- the booking desk.

17 Necaise walks over and says, hey, you
18 work at a casino, and he's standing directly in
19 front of me. And he says, you work in a casino.
20 I said, yes, sir, I do. He says, they don't like
21 no-call, no-shows, do they, mother fucker. I
22 said, no, they don't. He says, I used to work at
23 a casino and I worked at a casino for a long time,
24 and I'm going to make sure you get fired, he says,
25 because you're not getting a phone call, he says,



1 of what they do?

2 A. No. I'm not aware of the procedures.

3 Q. All right. So what happened next?

4 A. He escorted me out of the shower room.

5 Q. Out of the what?

6 A. Out of the shower room. And we stood in
7 the hallway for a minute, and I was put back in
8 the holding cell, Holding Cell Number 5.

9 Q. And you are clothed in inmate-issued
10 clothing at that time?

11 A. Yes.

12 Q. And your belongings, I guess, were
13 taken?

14 A. Yes. Catherine Pavolini was the one who
15 took my belongings, my wallet and keys, the remote
16 to the car and whatever items I had.

17 Q. And were they inventoried and did you
18 sign off of some type of sheet?

19 A. I signed off on the inventory sheet,
20 yes.

21 Q. Okay. And then what occurred after you
22 were placed in the holding cell?

23 A. Necaise continued to harass me. He
24 would walk by the booking room. He was like
25 walking to other cells and would hit the wall, hit



1 Q. So after you were knocking on the
2 window --

3 A. You know, I sat down and I waited. And
4 all of a sudden, I hear, five, and I didn't know
5 who it was, so I lean forward on the stool, on the
6 bench to see who was coming through. And Deputy
7 Judy -- I mean, Deputy Necaise walks in. Pavolini
8 is behind him. Deputy Necaise is putting on his
9 gloves. Pavolini posts herself at the door. The
10 door opens outwards. She puts her back to the
11 door.

12 Necaise walks up to me and says --
13 points to the ground in front of me with his right
14 hand and he says, stand up, so I stand up. And he
15 says, take a step forward, so I take a step
16 forward. And when I took a step forward, he had
17 already hit me in the chest with both hands with
18 such force that it took my breath away. I fell
19 over the bench and my foot was sort of tangled
20 underneath the bench. And when I hit the wall, my
21 head hit the wall.

22 And when my head hit the wall, I could
23 just feel this pain, you know, from my headaches.
24 And it was just intensified. And he started, he
25 started slapping me open palms right into my head.



1 A. Not that I'm aware of.

2 Q. Any other officers present that you're
3 aware of, other than Wills, Pavolini, Necaise?

4 A. Deputy Judy was around that area. I
5 saw -- he was in the area because -- I don't
6 exactly know his exact whereabouts in the booking
7 room, but he was there.

8 Q. Okay. And during the time that Necaise
9 was using force against you --

10 A. Well --

11 Q. Let me finish my question, please --
12 using force against you, were you aware of whether
13 he was using any type of defensive maneuver or
14 anything to that effect?

15 A. I don't know what any defensive
16 maneuvers are, you know. I mean, I don't know.

17 Q. You testified that he put your arm
18 behind your back at one point.

19 A. Yes.

20 Q. Are you aware if this was an arm bar
21 takedown or wrist lock or anything like that?

22 A. No. I'm not. Also, something I would
23 like to add is Pavolini was yelling, without
24 merits, stop resisting, stop resisting. I was not
25 resisting. I was 100 percent compliant to what



1 the orders were from the time I was arrested to
2 the time I left the jail.

3 Q. Did Necaise also tell you to stop
4 resisting at any point?

5 A. He said, stop resisting. They both --

6 Q. So no time were you beating on -- I'm
7 sorry.

8 A. They both said it.

9 Q. They both said, stop resisting?

10 A. Yes.

11 Q. Did they give you any other orders
12 during the time of this incident besides stand
13 here on this wall -- I mean, on the floor. Did
14 they give you any other orders besides, stop
15 resisting?

16 MR. CROSBY:

17 What time?

18 MS. BROOM:

19 During the incident in the holding cell.
20 The entire time, were they giving you any orders?

21 MR. CROSBY:

22 Other than what he's already told you?

23 MS. BROOM:

24 Right.

25 A. The orders were, pointing -- Necaise

1 Q. Where was that?

2 A. I guess it was next to it. I was taken
3 out -- I don't remember what for -- with Judy or
4 Necaise, but it seems like I might have been taken
5 out again of the cell, you know, into the hallway.
6 And at one point, I was -- they put me in another
7 cell for a few minutes, and it seems like they put
8 me back in that other one.

9 Q. So from Holding Cell 5, you were placed
10 in another cell inside booking?

11 A. Yes.

12 Q. And then were you placed in another
13 holding cell?

14 A. Just that one. I guess there was just
15 that one.

16 Q. Okay. Where were you located after
17 that? Were you relocated to the jail, general
18 population?

19 A. Yes. It was later that night I was
20 relocated to a cell block.

21 Q. Between the time that you were in that
22 second holding cell until you were relocated, did
23 anything occur during that time? Were you
24 physically assaulted in any manner?

25 A. Again?



1 Q. And which officer told you this?

2 A. That was the young, white male.

3 Q. Young, white male. About how tall is
4 he?

5 A. Like 5'7" or 5'8" maybe.

6 Q. Is he the one with the glasses or was
7 that the black individual?

8 A. The black individual had glasses. This
9 was the young -- in his 20s, I guess. Maybe late
10 20s. I'd say he's late 20s, early 30s.

11 Q. Okay. So from the time you entered the
12 jail until this time, until you were released, the
13 people you asked medical treatment from are the
14 white male, the black male, the nurse?

15 A. The nurse. And then also -- that's who
16 I asked medical treatment. But there was another
17 guy that walked in with an ink pen. The white
18 male deputy said he can't help me, he can't get me
19 medical treatment. He says, he can't let me make
20 a phone call, he can't give me my medication, I
21 have to go see the nurse. When the nurse comes
22 in -- she'll be in here. When the nurse comes in,
23 you go see her.

24 So a little while later, the nurse comes
25 in. She's treating -- I believe there's a dog

1 areas of that.

2 She comes back in and she -- I catch up
3 with her, I say, ma'am, here's my form. I said,
4 look, I was punched and kicked and beaten by these
5 deputies in the next room or maybe I just called
6 it booking, but the room where I was processed in.
7 She was looking at the form. I said, ma'am, if
8 you feel right here in my head line -- my
9 hairline, you can feel it, so she kind of reached
10 out reading the form. And she felt -- she read
11 that. She goes, yeah, I can't help you. She gave
12 me the form back.

13 Q. So medical staff did see you, the nurse?

14 A. Yes. She gave my form back to me and
15 says, I cannot help you, I was in general
16 population, and she walked away.

17 MR. CROSBY:

18 I'm going to object to the form of that
19 question, so medical personnel did see you.

20 MS. BROOM:

21 Okay. I'll rephrase.

22 Q. So you were actually approached by
23 medical and she did speak with you about your
24 complaint; is that correct?

25 A. She spoke with me about my complaints,



1 Q. I understand that. I'm just trying to
2 know what you know now at this time prior to your
3 incident.

4 A. Prior to my incident as far as --

5 Q. Any and all previous instances of abuse
6 or unnecessary force that occurred at the jail
7 that you're aware of.

8 MR. CROSBY:

9 To your knowledge and individual
10 understanding.

11 His attorneys are going to provide a lot
12 of that.

13 MS. BROOM:

14 I understand.

15 MR. CROSBY:

16 But to your knowledge, if you can
17 recall. If you don't recall --

18 A. To my knowledge, there has a pattern of
19 abuse. My incident was in 2004. I think it
20 goes back to the year 2000 or 2002 when it
21 started, 2003.

22 MS. BROOM:

23 Q. How do you know this? What is your
24 basis for this?

25 A. Through the trial, witnesses testimony.



1 Q. Which trial?

2 A. Ryan Teel, Rick Gaston. Through
3 testimony from the former jailers who have pled
4 guilty, like Thomas Preston Wills, William
5 Jeffries, Dedri Caldwell, Morgan Lee Thompson,
6 Roderick Fulton and through testimony from the
7 former OIC, Vicki Burns Trible.

8 These individuals have stated in the
9 trial that Vicki Burns Trible said there was an
10 inmate that was hog tied who was delivered to the
11 sally port one time and Deputy Necaise beat him up
12 while he was hogtied, brought him to the shower
13 room and slammed him down on the ground and
14 assaulted him. And if I'm not mistaken, this guy
15 was tased.

16 Q. Do you know if it was before or after
17 your incident?

18 A. I'm not sure. But she also stated that
19 Wills, Necaise, Stolze, Roderick Fulton, they were
20 all out of control with their abuses and assaults
21 at the Harrison County jail in the booking room,
22 whether they tased people, pepper sprayed people
23 with OC, punched people, causing injuries,
24 refusing medical treatment.

25 Q. So you have no personal knowledge --